3-048682

United States Environmental Protection Agency (EPA)
Region 2
290 Broadway
New York, NY 10007-1866

Underground Storage Tank (UST) Inspection Form

INSPECTOR NAME(S): JEFF BLAIR **DATE:** 02/11/13

SIC CODE: **ICIS #:** 34000195583

I. Location of Tank(s) ☐ Tribal

Facility Name: MOBIL RIS #10441
Street Address: 407 WHITE PLAINS ROAD
City: EASTCHESTER State: NY Zip Code: 10709
County: WESTCHESTER
Phone Number: (914) 337-3799 Fax Number:
Contact Person(s): EDGAR AMADOR, ENV. COMP. SPECIALIST

II. Ownership of Tank(s) ☐ same as location (I.)

Owner Name: CPD NY ENERGY CORP.
Street Address: 536 MAIN STREET
City: NEW PALTZ State: NY Zip Code: 12561
County:
Phone Number: (845) 256-0162 Fax Number:
Contact Person(s): SCOTT PARKER, DIRECTOR — FACILITIES

IIA. Ownership of Other Facilities

☐ Do you own other UST Facilities **Yes** / **No**

If Yes, How many Facilities 32 (NYS) 236 How many USTs 307 (NYS) 857

III. Notification

☐ Notification to implementing agency; name WESTCHESTER COUNTY DOH (EFFECTIVE THROUGH 01/13/16)
State Facility ID # 3-048682

IV. Financial Responsibility

ACE ILLINOIS UNION INSURANCE CO.

☐ State Fund
☐ Guarantee ☐ Surety Bond
☐ Local Government ☐ Self Insured
☐ Private Insurance: Insurer/Policy # G23980477
☐ Letter of Credit
☐ **Not Required** (Federal & State government, hazardous substance USTs)

V. Release History

N/A ☑

☐ To your knowledge, are there any public or private Drinking Water Wells in the vicinity ? **Yes** / **No**

☐ Evidence of release or spills at facility
☐ Greater than 25 gallons (estimate)
☐ **Releases reported to implementing agency; if so, date(s)** _____ [280.53]
☐ Release confirmed; when and how _____
☐ Initial abatement measures and site characterization
☐ Free product removal
☐ Soil or ground water contamination
☐ Corrective action plan submitted
☐ Remediation ongoing
☐ Remediation completed, no further action; date(s) _____

Notes:

VI. Tank Information — Tank No.	100	200	300	400	600	700
Tank presently in use	YES	→	→	→	→	→
If not, date last used (see Section XII)						
If empty, verify 1" or less left (see Section XII)						
Capacity of Tank (gal)	6000G	→	8000G	4000G	6000G	1000G
Substance Stored	GASOLINE	→	→	→	→	WASTE OIL
M/Y Tank installed / Upgraded	12/94	→	→	06/90	12/94	06/98
Tank Construction: Bare steel, Sti-P3, Retrofitted sacrificial anode, Impressed Current, Composite, FRP, Interior lining, Vaulted, Double-walled (DW)	FRP	→	→	→	→	DW FRP
Spill Prevention	SPILL BUCKETS	→	→	→	→	→
Overfill Prevention (specify type)	AUTO SHUTOFFS	→	→	→	*NO	N/A
Special Configuration: Compartmentalized, Manifolded	MANIFOLDED	→	MANIFOLDED	→	NO	NO

VII. Piping Information						
Piping Type: Pressure, Suction	PRESSURE	→	→	→	→	GRAVITY
Piping Construction: Bare steel, Sacrificial Anode, Impressed Current, Flex, FRP, Double-walled (DW)	FRP	→	→	→	→	STEEL?

Tank and Piping Notes:

NO VERIFICATION OF OVERFILL PREVENTION ON MID-GRADE (#600)

TANK #600 IS #2 FUEL OIL

VIII. Cathodic Protection	N/A ☐					
Integrity Assessment conducted prior to upgrade						
Interior Lining: Interior lining inspected						
Impressed Current: CP Test records						
Impressed Current: Rectifier inspection records						
Sacrifical Anode: CP test records	YES	→	→	→		YES

CP Notes:

I REVIEWED PASSING CATHODIC PROTECTION TEST RESULTS TEST DATES → 11/29/12 + 12/05/11

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Tank No.	100	200	300	400	600	700
IX. UST system used solely by Emergency Power Generator	NO →					

X. Release Detection N/A ☐ TANK MONITOR → SIMPLICITY "TLS-350"

Tank RD Methods							
PASSING TTT ON 10/18/10 (ALLSTS)	ATG	YES →					
	Interstitial Monitoring						
	Groundwater Monitoring						
	Vapor Monitoring						
	Inventory Control w/ TTT						
	Manual Tank Gauging						
	Manual Tank Gauging w/ TTT						
	SIR						
12 Months Monitoring Records (*Must* Make Available Last 12 Months For Compliance)		YES →		* NO →		YES →	

Tank RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED PREVIOUS TWELVE MONTHS OF CSLD RESULTS:
RSC (100 + 200) → 12/12 PASSING RESULTS
PRE (300 + 400) → 4/12 PASSING RESULTS
FEB, MAY NOV + DEC 2012 ONLY PASSING RESULTS
MID (600) → 12/12
+ WASTE OIL (700) → 12/12

Pressurized Piping RD Methods		N/A ☐					N/A ☑
	Interstitial Monitoring						
	Groundwater Monitoring						
	Vapor Monitoring						
	SIR						
12 Months Monitoring Records							
	Annual Line Tightness Test	YES →					
ALLD	Present	YES →					
	Annual Test	YES →					

Piping RD Notes: (State What Months Records Were Available, Describe Any Failures and Describe What Investigation Occurred Due to Failure)

I REVIEWED PASSING LEAK DETECTOR AND PRESSURIZED LINE TEST RESULTS (TEST DATE → 11/29/12)
USING PLLD, TESTING PRESSURIZED PIPING TO 3.0 GAL/HR, 0.2 GAL/HR AND 0.1 GAL/HR

XI. Repairs

N/A ☐

Repaired tanks and piping are tightness tested within 30 days of repair completion	Y ☐ N ☐ Unknown ☐
CP systems are tested/inspected within 6 months of repair of any cathodically protected UST system	Y ☐ N ☐ Unknown ☐
Records of repairs are maintained	Y ☐ N ☐ Unknown ☐

XII. Temporary Closure

N/A ☐

CP continues to be maintained	Y ☐ N ☐ Unknown ☐
UST system contains product and release detection is performed	Y ☐ N ☐ Unknown ☐
Cap and secure all lines, pumps, manways	Y ☐ N ☐ Unknown ☐

Notes:

3-043682

THE UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA) REGION 2 UST PROGRAM
Ground Water Compliance Section
New York, NY 10007-1866

Inspector Observation Report

Inspection of Underground Storage Tanks (USTs)

☐ No violations observed at the conclusion of this inspection.

☐ The above named facility was inspected by a duly authorized representative of EPA Region 2, and the following are the inspector's observations and/or recommended corrective action(s):

Violations Observed:

Regulatory Citation	Violation Description
§ 280.21(d)	FAILURE TO PROVIDE OVERFILL PREVENTION FOR AN
§	EXISTING SYSTEM
§	
§ 280.45	FAILURE TO MAINTAIN RECORDS OF RELEASE DETECTION
§	MONITORING
§	
§	
§	

Actions Taken:
☐ Field Citation; # _____ ☐ Additional information required ☐ On-site request/Due date _____

Comments/Recommendations:

- NO VERIFICATION OF OVERFILL PREVENTION ON MID-GRADE TANK
- PROVIDED ONLY 4/12 PREVIOUS MONTHS OF PASSING CSLD RESULTS ON PREMIUM TANKS

Name of Owner/Operator Representative:

Edgar Amador
(Please print)

(Signature)

Other Participants: _____

Name of EPA Inspector/representative

JEFFREY K BLAIR
(Please print)

Jeffrey K Blair
(Signature)

(Credential Number)

Date of Inspection 02/11/13 Time 10:40 AM/PM

Init/Date JKB 02/11/13

SITE DRAWING

DATE: 02/11/13 TIME ON SITE: 9:30AM TIME OFF SITE: 10:45AM

WEATHER: 35° + RAINING

ENVIRONMENTALLY SENSITIVE AREA : Y ☐ N ☑
If "Yes", please describe:

(SEE ATTACHED DIAGRAM)

PHOTOS

210 FUEL PAD
211 FP PRE
212 STP PRE
213 FP REG
214 FP REG
215 STP REG
216 FP PRE
217 STP PRE
218 FP MID
219 FUEL PAD MID
220 STP MID
221 FP WASTE OIL
222 TANK MONITOR
223 SITE

☑ Pictures

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Required Fields to be used for ICIS Only

Compliance Monitoring

Activity: UST Inspection

Inspection Conclusion Data Sheet

1) Did you observe deficiencies (preferred violations) during the on-site inspection? YES

Deficiencies observed: (Put an **X** for each observed deficiency)

X Potential failure to complete or submit a notification, report, certification, or manifest

X Potential failure to follow or develop a required management practice or procedure

X Potential failure to maintain a record or failure to disclose a document

X Potential failure to maintain/inspect/repair meters, sensors, and recording equipment

___ Potential failure to report regulated events, such as spills, accidents, etc.

2) If you observed deficiencies, did you communicate the deficiencies to the Facility during the inspection? **Yes / No**

3) Did you observe the Facility take any actions during the inspection to address the deficiencies noted? **Yes / No**

If yes, what actions were taken? WILL PHOTOGRAPH BALL VALVE + FORWARD TO EPA/CONTRACTOR

4) Did you provide general Compliance Assistance in accordance with the policy on the role of the EPA Inspector In providing Compliance Assistance during Inspections? **Yes / No**

5) Did you provide site-specific Compliance Assistance in accordance with the policy on the role of the EPA Inspector in providing Compliance Assistance during the inspection? **Yes / No**

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Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
I. Spill Prevention	1	Spill prevention device is present and functional. [280.20(c)(1)(i), 280.21(d)]		✓	
II. Overfill Prevention	2	Overfill prevention device is present and operational. [280.20(c)(1)(ii), 280.21(d)]			✓
		❑ Automatic shutoff is operational (ie., device not tampered with or inoperable) [280.20(c)(1)(ii)(A), 280.21(d)] ❑ Alarm is operational. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Alarm is audible or visible to delivery driver. [280.20(c)(1) (ii)(B), 280.21(d)] ❑ Ball float is operational. [280.20(c)(1)(ii)(B), 280.21(d)]			
III a. Operation and Maintenance	3	Repaired tanks and piping were tightness tested within 30 days of repair completion (not required w/internal inspections or if monthly monitoring is in use). [280.33(d)]	✓		
III b. Operation and Maintenance of Corrosion Protection	4	CP systems were tested/inspected within 6 months of repair of any cathodically protected UST system. [280.33(e)]	✓		
	5	Corrosion protection system is properly operated and maintained to provide continuous protection. [280.31(a)(b), 280.70(a)]		✓	
		❑ UST system (Choose one) ☑ UST in operation ❑ UST in temporary closure ❑ CP System is properly operated and maintained ☑ CP system is performing adequately based on results of testing. [280.31(b)]; - or - ❑ CP system tested within required period and operator is conducting or has completed appropriate repair in response to test results reflecting CP system not providing adequate protection.			

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Release Prevention Compliance Measures Matrix

Regulatory Subject Area	Measure #	SOC Measure / Federal Citation	In Compliance?		
			N/A	Y	N
III b. Operation and Maintenance of Corrosion Protection (Continued)	6	UST systems with impressed current cathodic protection are inspected every 60 days. [280.31(c)]	✓		
	7	Lined tanks are inspected periodically and lining is in compliance. [280.21(b)(1)(ii)]	✓		
IV. Tank and Piping Corrosion Protection	8	Buried metal tank and piping (which includes fittings, connections, etc.) is corrosion protected. [280.20(a), 280.20(b), 280.21(b), 280.21(c)]		✓	
		❑ Buried metal piping components (such as swing joints, flex-connector, etc.) are isolated from the soil or cathodically protected.			
		For new USTs - tanks and piping installed after 12/22/88 [280.20(a), 280.20(b)]:			
		❑ Steel tank or piping is coated with suitable dielectric material and cathodically protected. [280.20(a)(2), 280.20(b)(2)]			
		❑ Tank is fiberglass, clad, or jacketed and piping is fiberglass or flexible plastic. [280.20(a)(1), 280.20(a)(3), 280.20(a)(5), 280.20(b)(1), 280.20(b)(4)]			
		❑ Records are available to document that CP is not necessary. [280.20(a)(4)(ii), 280.20(b)(3)(ii)]			
		For existing USTs - tanks and piping installed on or before 12/22/88 [280.21(b), 280.21(c)]: ❑ Tank and piping meet new UST requirements [280.21(a)(1)]			
		❑ Steel tank is internally lined. [280.21 (b)]			
		☑ Metal tank and piping are cathodically protected. [280.21(b)(2), 280.21(c)]			

Notes: N/A - Indicates that the measure is not applicable.
Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Prevention Compliance Measures. In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.

Release Detection Compliance Measures Matrix

Instructions - To Determine Compliance Status of Measures #1-7,
Work Through the Worksheet "Commonly Used Release Detection Methods" Below.

Regulatory Subject Area	Measure #	SOC Measure/ Federal Citation	In Compliance? N/A	Y	N
I. Release Detection Method Presence and Performance Requirements	1	Release detection method is present. [280.40(a)]		✓	
	2	Release detection system is operating properly (i.e., able to detect a release from any portion of the system that routinely contains product). [(280.40(a)(1)]		✓	
	3	Release detection system meets the performance standards at 280.43 or 280.44. [(280.40(a)(3)]		✓	
	4	Implementing agency has been notified of suspected release as required. [(280.40(b)]	✓		
		❑ Non-passing results reported and resolved in accordance with implementing agency's directions. [280.40(b)]			
II. Release Detection Testing	5	Tanks and piping are monitored monthly for releases and records are available (must have records for the two most recent consecutive months and for 8 months of the last 12 months). [280.41(a), and 280.45(b)]			✓
III. Hazardous Substance UST Systems	6	Hazardous substance UST system leak detection meets the requirements (i.e., either secondarily contained or otherwise approved by the implementing agency). [280.42(b)]	✓		
IV. Temporary Closure	7	Release detection requirements are complied with (i.e., method present, operational, releases investigated and reported as required) for UST systems containing product. [280.70(a)]	✓		

Worksheet - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
❑			**A. Inventory Control with Tank Tightness Testing (T.T.T)** ❑ Inventory control is conducted properly. ❑ T.T.T. performed as required (See "D" below). ❑ Inventory volume measurements for inputs, withdrawals, and remaining amounts are recorded each operating day and reconciled as required. [280.43(a)(1), 280.43(a)(3)] ❑ Equipment is capable of 1/8-inch measurement. [280.43(a)(2)] ❑ Product dispensing is metered and recorded within local standards for meter calibration to required accuracy. [280.43(a)(5)] ❑ Water is monitored at least monthly. [280.43(a)(6)]

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Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
☐			**B. Automatic Tank Gauge (ATG)** ☐ ATG is set up properly. [280.40(a)(2)] ☐ ATG can detect a 0.2 gal/hr leak rate from any portion of the tank routinely containing product. [280.43(d)(1)] ☐ ATG is checking portion of tank that routinely contains product. [280.40(a)(1)]
☐			**C. Manual Tank Gauging (MTG)** ☐ Tank size is appropriate for using MTG. [280.43(b)(5)] ☐ Tanks 1001 gals (as per EPA memo) and greater restricted to use with T.T.T. (See "D" below) ☐ Method is being conducted correctly. [280.43(b)(4)] ☐ No liquid was added to or taken out of the tank during the test. [280.43(b)(1)] ☐ Equipment is capable of 1/8-inch measurement. [280.43(b)(3)]
☐	☐	☐	**D. Tightness Testing** (Safe Suction piping does not require testing) ☐ Testing method is capable of detecting a 0.1 gal/hr leak rate from any portion of tank routinely containing product. [280.43(c)] ☐ Tightness testing is conducted within specified time frames for method: ☐ **Tanks** - every 5 years [280.41(a)(1)] ☐ **Pressurized Piping** - annually [280.41(b)(1)(ii)] ☐ **Non-exempt suction piping** - every 3 years [280.41(b)(2)] ☐ Tightness testing is conducted following manufacturer's instructions. [280.40(a)(3)]
☐	☐	☐	**E. Ground Water or Vapor Monitoring** ☐ Ground water in the monitoring well is never more than 20 feet from the ground surface. [280.43(f)(2)] ☐ Vapor monitoring well is not affected by high ground water. [280.43(e)(3)] ☐ Site assessment has been done for vapor or ground water monitoring. [280.43(e)(6), 280.43(f)(7)] ☐ Wells are properly designed and positioned. [280.43(e)(6), 280.43(f)(7)]
☐	☐	☐	**F. Interstitial Monitoring** ☐ Secondary containment can be used to detect a release [280.43(g)(1)], 280.43(g)(2)] ☐ Sensor properly positioned. [280.40(a)(2)]

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Worksheet (Continued) - Commonly Used Release Detection Methods

Tank (Choose one)	Pressurized Pipe (Choose Two)	Non-exempt Suction Pipe (Choose one)	Release Detection Method
	☑		**G. Automatic Line Leak Detector (ALLD)** ☐ ALLD is present and operational. [280.44(a)] ☑ Annual function test of the ALLD has been conducted and records are available. [280.44(a)]
☐	☐	☐	**H. Other Methods [e.g., Statistical Inventory Reconciliation (S.I.R.)]** ☐ The method can detect a 0.2 gal/hr leak rate or a release of 150 gal within a month and meet the 95/5 requirement [280.43(h)(1)]; or ☐ The implementing agency has approved the method as being as effective as tank tightness testing, automatic tank gauging, vapor monitoring, ground water monitoring, or interstitial monitoring and the operator complies with any conditions imposed by agency. [280.43(h)(2)] ☐ S.I.R. - Results are received within time frame established by implementing agency. [280.41(a) & 280.43(h)]

Notes: N/A - Indicates that the measure is not applicable.

Any mark in the "N" (No) column means that the facility is not in Significant Operational Compliance (SOC) with Release Detection Compliance Measures.

In order for a compliance measure to be in SOC, all applicable check-box items must be in compliance.